

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND**  
*(Baltimore division)*

**IN RE:** \*  
**JEF DAN PROPERTIES, LLC** \* **Case No.: 25-12364-NVA**  
**Debtor** \* **Chapter 11**  
\* \* \* \* \* \* \* \* \* \* \* \* \* \* \*

**DEBTOR'S RESPONSE  
TO ORDER TO SHOW CAUSE**

Robert N. Grossbart, attorney for the Debtor, in response to the Show Cause Order Filed to Show Cause Why Chapter 11 Case Should Not Be Denied for Failure to Provide Required Documents to Chapter 11 Trustee.

1. The Debtor filed Chapter 11 Bankruptcy on March 19, 2025, case number 25-12364.
2. That on March 21, 2025, your Honorable Nancy V. Alquist entered an Order to Show Cause Why Chapter 13 Case Should Not Be Dismissed for Failure to Provide Required Documents to Chapter 13 Trustee.
3. That the Debtor does not have a balance sheet, statement of operations, cash flow statement and federal tax return because the Debtor owns only one real property that was under construction but near completion to becoming a rental property.

WHEREFORE, the Debtor prays that this Honorable Court dissolves the Show Cause Order and allows the present case to continue to its legal conclusion.

/s/ Robert N. Grossbart  
Robert N. Grossbart, Esquire  
Federal Bar No.: 04116-G  
One Charles Center  
100 North Charles Street, 20<sup>th</sup> floor  
Baltimore, Maryland 21201  
(410) 837-0590  
Attorney for Debtor

**CERTIFICATION OF MAILING**

I HEREBY CERTIFY, that on Friday, April 04, 2025, a copy of the foregoing Response to Show Cause was mailed first class, postage prepaid/ to the Debtor; Office of the U.S. Trustee, 101 W. Lombard Street, Baltimore, MD 21201,; Gerard R. Vetter, Chapter 11 Trustee, DOJ-USTG, 101 W. Lombard Street, Suite 2625, Baltimore, MD 21201

/s/ Robert N. Grossbart  
Robert N. Grossbart, Esquire